

**Marie-Ann Greenberg, MAG-1284**  
**Marie-Ann Greenberg, Standing Trustee**  
**30 TWO BRIDGES ROAD**  
**SUITE 330**  
**FAIRFIELD, NJ 07004-1550**  
**973-227-2840**

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IN RE:

CAROL A MARSHALL  
MITZY C MARSHALL

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**UNITED STATES BANKRUPTCY COURT**  
**DISTRICT OF NEW JERSEY**

**Case No.: 13-27986RG**

**HEARING DATE: 07/08/2014 at 10:00 am**

### **OBJECTION TO MOTION TO REINSTATE**

Marie-Ann Greenberg, the Chapter 13 Standing Trustee Marie-Ann Greenberg, the Chapter 13 Standing Trustee

- The third circuit has ruled that the burden lies on the debtor to show a change in circumstances in order for a case to be reinstated, in the case at bar no such proffer has been made (In re Wedgewood).
- The debtor's case was dismissed due to the debtor's failure to address the Interim Confirmation Order entered on March 13, 2014. To date, these items are unresolved, there has been an amended schedule I filed at docket #41, but this is still not the up to date form, meanwhile the Statement of Financial Affairs and Schedule D remain unchanged.
- A modified plan was filed at docket#40; however, the same issues in Part 7 remain.
- In addition, the debtor now owes the Trustee \$6,776.00 through July 2014. The debtor indicates that these funds are readily available but no such proof of the same has been provided.

It is for these reasons that the Motion to Reinstate the Case should be denied.

Dated: June 16, 2014

By: /S/Marie-Ann Greenberg  
Marie-Ann Greenberg, Esquire  
Chapter 13 Standing Trustee